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THE BLUEBERRY HILL LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION**

The Blueberry Hill LLC,
a Utah limited liability company,

Plaintiff,

v.

Shalom International Corp.,
a New Jersey corporation,

Defendant.

Complaint

Civil Action No. _____

Judge _____

(Jury Demanded)

Plaintiff The Blueberry Hill LLC (“Blueberry Hill”) hereby complains against defendant Shalom International Corp. (“Shalom”) for the causes of action alleged as follows:

The Parties

1. Blueberry Hill is a limited liability company duly organized and existing under the laws of the State of Utah, with its principal place of business located at 1963 South 1200 East #702, Salt Lake City, Utah, 84105.

2. Shalom is a corporation organized and existing under the laws of the State of New Jersey, with its principal place of business located at 700 Milik Street, Carteret, New Jersey, 07008.

Jurisdiction and Venue

3. This is a civil action for copyright infringement arising under the Copyright Act 17 U.S.C. § 101 *et seq.*, trade dress infringement arising under the Lanham Act of 1946, as amended, 15 U.S.C. § 1052, *et seq.*, unfair competition arising under Utah Code Ann. § 13-5a-102(4)(a)(ii)(B), and deceptive trade practices under Utah Code Ann. § 13-11a-3(1)(b).

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction over the related state law claims under 28 U.S.C. § 1367(a) because they arise out of the same occurrences alleged in the Complaint so as to form a part of the same case or controversy within the meaning of Article III of the United States Constitution.

5. This Court has personal jurisdiction over Shalom because Shalom has purposely availed itself of the privileges and benefits of the laws of the State of Utah, and has committed acts of copyright infringement, as well as acts of trade dress infringement, deceptive business practices, and unfair competition, within this judicial district.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400.

Background

Blueberry Hill's Trade Dress

7. Blueberry Hill is a well-known company that makes and sells infant wear. Blueberry Hill is most renowned for its knit hats and newborn sets. Blueberry Hill brand infant wear is sold throughout the United States, and in many countries around the world, including through Blueberry Hill's popular website, www.theblueberryhill.com, in over 600 brick and mortar department stores and children's boutiques, and through numerous third-party retailers online.

8. Blueberry Hill's "Hartley" Deer and "Rusty" Fox Newborn Sets (collectively, the "BH Designs") are among its most sought-after and recognized original styles. Blueberry Hill has continuously used the same trade dress for its BH Designs (hereinafter "BH Trade Dress").

9. The trade dress of the Hartley Deer Newborn Set features a knit hat adorned with decorative animal antlers and ears, and pants ornamented with a whimsical soft, fluffy white tail. The design is made of woodsy brown colored yarn with white accents on the antlers, ears, and tail. An exemplary image of the trade dress incorporated in the Hartley Deer Newborn Set can be seen in Exhibit A, filed concurrently herewith.

10. The trade dress of the Rusty Fox Newborn Set features a knit hat adorned with decorative animal ears, and pants ornamented with a whimsical soft, fluffy white tail. The design is made of yarn in a rusty orange color with white and black accents on the ears and tail. An exemplary image of the trade dress incorporated in the Rusty Fox Newborn Set can be seen in Exhibit B, filed concurrently herewith.

11. As a result of Blueberry Hill's continuous use of the BH Trade Dress, including advertisement, marketing, and sales utilizing the BH Trade Dress, the BH Trade Dress has become an asset of substantial value to Blueberry Hill as a distinctive indication of the origin and quality of Blueberry Hill brand products.

12. Blueberry Hill uses the BH Trade Dress in interstate commerce in connection with the sale and advertising of its products nationwide and throughout the world.

13. By using the BH Trade Dress, Blueberry Hill has developed significant and valuable goodwill in this mark.

14. Blueberry Hill's knit sets, which incorporate the BH Trade Dress, retail for \$56, with its hats retailing separately for \$28.

Shalom's Infringement of Blueberry Hill's BH Trade Dress

15. Shalom is profiting off of Blueberry Hill's creativity and success by selling Reindeer and Fox "Chunky Knit Hat & Pant Sets" under the brand name So'Dorable (the "Infringing Products").

16. Shalom copied the distinctive BH Trade Dress for use in the marketing and sales of its Infringing Products. An exemplary image of the Infringing Products can be seen in Exhibit C, filed concurrently herewith.

17. Shalom's copying of the BH Trade Dress in its Infringing Products incorporates every element of the BH Trade Dress.

18. Shalom's incorporation of the BH Trade Dress into its Infringing Products is likely to cause confusion, mistake, or deception, as those encountering Shalom's Infringing

Products will mistakenly assume that Shalom's Infringing Products are sponsored, endorsed, approved by, or connected with Blueberry Hill, when in fact they are not.

19. Shalom's \$14.99 price point for the Infringing Products is also likely to divert sales away from Blueberry Hill and to significantly tarnish Blueberry Hill's reputation for high quality apparel.

20. Shalom's previously enumerated actions have caused, and continue to cause, Blueberry Hill extensive financial damage and damage to the value and goodwill of the BH Trade Dress.

21. In addition to the significant financial damage that Blueberry Hill has and is suffering as a result of Shalom's actions, Blueberry Hill is suffering immediate and irreparable harm.

Blueberry Hill's Copyrighted BH Image

22. In addition to Blueberry Hill's rights in the BH Trade Dress, Blueberry Hill is also the exclusive owner of copyright rights in numerous original images and photographs of the BH Designs.

23. The copyrighted images are used by Blueberry Hill to market and sell the BH Designs.

24. A representative example of Blueberry Hill's copyrighted images is attached hereto as Exhibit D, which is a copy of an original work titled, "The Blueberry Hill Knit Deer Set." This image is the subject of U.S. Copyright Registration No. VAu 1-244-211 (The "BH Image").

25. A copy of the Certificate of Registration for the BH Image is attached hereto as Exhibit E.

26. A copy of the BH Image is prominently featured on the front page of Blueberry Hill's website. As such, Shalom has had access to BH Image since it was first published on the website.

27. Blueberry Hill is, and has been at all relevant times, the owner of all rights in the BH Image. Blueberry Hill has never assigned the copyright in these works to any other entity.

Shalom's Infringement of Blueberry Hill's rights in the BH Image

28. Not only do Shalom's Infringing products incorporate every element of Blueberry Hill's BH Trade Dress, the packaging of Shalom's Infringing Products also feature images that replicate the BH Image and modify the same without permission to do so, including at least a copy or modified copy of the BH Image with Shalom's Reindeer "Chunky Knit Hat & Pant Set" and a modification of the BH Image with Shalom's Fox "Chunky Knit Hat & Pant Set" (collectively, "Infringing Images").

29. An example of Shalom's copying of the BH Image, its modification of the BH Image, and its incorporation of the BH Image into the packaging of the Infringing Products, can be seen in Exhibit C.

30. The rights in the BH Image are exclusively owned by Blueberry Hill. Shalom does not have any right to use or modify the BH Image.

31. The BH Image and Infringing Images are substantially similar. Given the extensive and substantial similarity, Shalom is aware of Blueberry Hill, its products, and the BH Image.

32. In December 2016, Shalom attempted to purchase one of every product sold by Blueberry Hill through Blueberry Hill's online retail store.

33. Based on the foregoing, Shalom manufactures, distributes and promotes the Infringing Images, and the Infringing Products, with access to and the intent to purposely copy the BH Image and the BH Trade Dress, and further to pass off Shalom's Infringing Products as those of Blueberry Hill. Shalom intends to violate, and has violated Blueberry Hill's rights, interfered with Blueberry Hill's business, and unlawfully profited at the expense of Blueberry Hill.

34. Shalom's blatant copying of the BH Image violates Blueberry Hill's copyrights in the BH Image.

35. In addition to the significant financial damage that Blueberry Hill has and is suffering as a result of Shalom's copyright infringement, Blueberry Hill is suffering immediate and irreparable harm.

FIRST CLAIM FOR RELIEF
Trade Dress Infringement, 15 U.S.C. § 1125(a)

36. By this reference Blueberry Hill realleges and incorporates the foregoing paragraphs as though fully set forth herein.

37. Shalom's use of the BH Trade Dress in Shalom's manufacture and packaging of its Infringing Products is deceptive and is likely to cause mistake and confusion regarding whether Shalom's goods and services originate from Blueberry Hill, or are sponsored, or approved of, by Blueberry Hill.

38. By its aforementioned acts, Shalom has infringed Blueberry Hill's federal trademark rights in the BH Trade Dress in violation of section 32 of the Lanham Act, 15 U.S.C. § 1125(a).

39. Shalom's acts have been willful and in conscious disregard of Blueberry Hill's rights in the BH Trade Dress.

40. Blueberry Hill has suffered and will continue to suffer irreparable injury for which Blueberry Hill has no adequate remedy at law.

41. Blueberry Hill is entitled to damages in an amount to be established at trial.

42. Blueberry Hill has no adequate remedy at law for the irreparable injury it has suffered and will continue to suffer unless Shalom is both preliminarily and permanently enjoined from its infringing and improper conduct.

SECOND CLAIM FOR RELIEF
Copyright Infringement, 17 U.S.C. § 501

43. By this reference Blueberry Hill realleges and incorporates the foregoing paragraphs as though fully set forth herein.

44. Blueberry Hill created, and is the owner of all rights in and to, the BH Image.

45. Blueberry Hill, as owner of all rights and interest in and to the BH Image, is entitled to exclusive rights to use, reproduce, distribute, publicly display, publish, and prepare derivative works of the same under the Copyright Act, 17 U.S.C. § 106.

46. Upon information and belief, Shalom's images used in connection with its Reindeer "Chunky Knit Hat & Pant Set" was copied or derived from Blueberry Hill's copyrighted BH Image.

47. Shalom was not, and is not, authorized to copy, reproduce, distribute, publicly display, publish, or prepare derivative works that infringe Blueberry Hill's rights in the BH Image.

48. Shalom's acts of copying, reproduction, publication, and public display of the BH Image violate Blueberry Hill's exclusive rights granted by 17 U.S.C. § 106, and constitute infringement under 17 U.S.C. § 501.

49. The BH Image is displayed with notice of its copyright claimed by Blueberry Hill.

50. Shalom was aware of Blueberry Hill's rights in the BH Image and had reason to believe that its acts of copying the BH Image constitute infringement of Blueberry Hill's rights therein, thereby rendering Shalom's infringement willful.

51. By reason of Shalom's infringement, Blueberry Hill has sustained, and will continue to sustain substantial injury, loss, and damage to its rights in the BH Image.

52. Further, irreparable harm to Blueberry Hill is imminent as a result of Shalom's conduct, and Blueberry Hill is without and adequate remedy at law. Blueberry Hill is therefore entitled to an injunction restraining Shalom, its officers, directors, agents, employees, representatives, and all persons operating in concert with it from engaging in further such acts of copyright infringement, pursuant to 17 U.S.C. § 502.

53. Blueberry Hill is further entitled, during the pendency of this action, to an order from the Court impounding Shalom's Infringing Images, including those used in connection with its Reindeer "Chunky Knit Hat & Pant Set," and, as part of the Court's final judgment or decree, an order that all copies of Shalom's Infringing Images be destroyed pursuant to 17 U.S.C. § 503.

54. Blueberry Hill is further entitled to recover the damages, pursuant to 17 U.S.C. § 504, and Blueberry Hill's costs and attorney's fees, pursuant to 17 U.S.C. § 505.

THIRD CLAIM FOR RELIEF
Copyright Infringement, 17 U.S.C. § 501

1. By this reference Blueberry Hill realleges and incorporates the foregoing paragraphs as though fully set forth herein.

2. Blueberry Hill created, and is the owner of all rights in and to, the BH Image.

3. Blueberry Hill, as owner of all rights and interest in and to the BH Image, is entitled to exclusive rights to use, reproduce, distribute, publicly display, publish, and prepare derivative works of the same under the Copyright Act, 17 U.S.C. § 106.

4. Upon information and belief, Shalom's images used in connection with its Fox "Chunky Knit Hat & Pant Set" was copied or derived from Blueberry Hill's copyrighted BH Image.

5. Shalom was not, and is not, authorized to copy, reproduce, distribute, publicly display, publish, or prepare derivative works that infringe Blueberry Hill's rights in the BH Image.

6. Shalom's acts of copying, reproduction, publication, and public display of the BH Image violate Blueberry Hill's exclusive rights granted by 17 U.S.C. § 106, and constitute infringement under 17 U.S.C. § 501.

7. The BH Image is displayed with notice of its copyright claimed by Blueberry Hill.

8. Shalom was aware of Blueberry Hill's rights in the BH Image and had reason to believe that its acts of copying the BH Image constitute infringement of Blueberry Hill's rights therein, thereby rendering Shalom's infringement willful.

9. By reason of Shalom's infringement, Blueberry Hill has sustained, and will continue to sustain substantial injury, loss, and damage to its rights in the BH Image.

10. Further, irreparable harm to Blueberry Hill is imminent as a result of Shalom's conduct, and Blueberry Hill is without and adequate remedy at law. Blueberry Hill is therefore entitled to an injunction restraining Shalom, its officers, directors, agents, employees, representatives, and all persons operating in concert with it from engaging in further such acts of copyright infringement, pursuant to 17 U.S.C. § 502.

11. Blueberry Hill is further entitled, during the pendency of this action, to an order from the Court impounding Shalom's Infringing Images, including those used in connection with its Fox "Chunky Knit Hat & Pant Set," and, as part of the Court's final judgment or decree, an order that all copies of Shalom's Infringing Images be destroyed pursuant to 17 U.S.C. § 503.

12. Blueberry Hill is further entitled to recover the damages, pursuant to 17 U.S.C. § 504, and Blueberry Hill's costs and attorney's fees, pursuant to 17 U.S.C. § 505.

FOURTH CLAIM FOR RELIEF
Copyright Infringement, 17 U.S.C. § 501

1. By this reference Blueberry Hill realleges and incorporates the foregoing paragraphs as though fully set forth herein.

2. Blueberry Hill created, and is the owner of all rights in and to, the BH Image.

3. Blueberry Hill, as owner of all rights and interest in and to the BH Image, is entitled to exclusive rights to use, reproduce, distribute, publicly display, publish, and prepare derivative works of the same under the Copyright Act, 17 U.S.C. § 106.

4. Upon information and belief, Shalom's Reindeer "Chunky Knit Hat & Pant Set" was copied or derived from Blueberry Hill's copyrighted BH Image.

5. Shalom was not, and is not, authorized to copy, reproduce, distribute, publicly display, publish, or prepare derivative works that infringe Blueberry Hill's rights in the BH Image.

6. Shalom's acts of copying, reproduction, publication, and public display of the BH Image violate Blueberry Hill's exclusive rights granted by 17 U.S.C. § 106, and constitute infringement under 17 U.S.C. § 501.

7. The BH Image is displayed with notice of its copyright claimed by Blueberry Hill.

8. Shalom was aware of Blueberry Hill's rights in the BH Image and had reason to believe that its acts of copying the BH Image constitute infringement of Blueberry Hill's rights therein, thereby rendering Shalom's infringement willful.

9. By reason of Shalom's infringement, Blueberry Hill has sustained, and will continue to sustain substantial injury, loss, and damage to its rights in the BH Image.

10. Further, irreparable harm to Blueberry Hill is imminent as a result of Shalom's conduct, and Blueberry Hill is without and adequate remedy at law. Blueberry Hill is therefore entitled to an injunction restraining Shalom, its officers, directors, agents, employees, representatives, and all persons operating in concert with it from engaging in further such acts of copyright infringement, pursuant to 17 U.S.C. § 502.

11. Blueberry Hill is further entitled, during the pendency of this action, to an order from the Court impounding Shalom's Reindeer "Chunky Knit Hat & Pant Set," and, as part of the Court's final judgment or decree, an order that all copies of Shalom's Reindeer "Chunky Knit Hat & Pant Set" be destroyed pursuant to 17 U.S.C. § 503.

12. Blueberry Hill is further entitled to recover the damages, pursuant to 17 U.S.C. § 504, and Blueberry Hill's costs and attorney's fees, pursuant to 17 U.S.C. § 505.

FIFTH CLAIM FOR RELIEF
Copyright Infringement, 17 U.S.C. § 501

1. By this reference Blueberry Hill realleges and incorporates the foregoing paragraphs as though fully set forth herein.

2. Blueberry Hill created, and is the owner of all rights in and to, the BH Image.

3. Blueberry Hill, as owner of all rights and interest in and to the BH Image, is entitled to exclusive rights to use, reproduce, distribute, publicly display, publish, and prepare derivative works of the same under the Copyright Act, 17 U.S.C. § 106.

4. Upon information and belief, Shalom's Fox "Chunky Knit Hat & Pant Set" was copied or derived from Blueberry Hill's copyrighted BH Image.

5. Shalom was not, and is not, authorized to copy, reproduce, distribute, publicly display, publish, or prepare derivative works that infringe Blueberry Hill's rights in the BH Image.

6. Shalom's acts of copying, reproduction, publication, and public display of the BH Image violate Blueberry Hill's exclusive rights granted by 17 U.S.C. § 106, and constitute infringement under 17 U.S.C. § 501.

7. The BH Image is displayed with notice of its copyright claimed by Blueberry Hill.

8. Shalom was aware of Blueberry Hill's rights in the BH Image and had reason to believe that its acts of copying the BH Image constitute infringement of Blueberry Hill's rights therein, thereby rendering Shalom's infringement willful.

9. By reason of Shalom's infringement, Blueberry Hill has sustained, and will continue to sustain substantial injury, loss, and damage to its rights in the BH Image.

10. Further, irreparable harm to Blueberry Hill is imminent as a result of Shalom's conduct, and Blueberry Hill is without and adequate remedy at law. Blueberry Hill is therefore entitled to an injunction restraining Shalom, its officers, directors, agents, employees, representatives, and all persons operating in concert with it from engaging in further such acts of copyright infringement, pursuant to 17 U.S.C. § 502.

11. Blueberry Hill is further entitled, during the pendency of this action, to an order from the Court impounding Shalom's Fox "Chunky Knit Hat & Pant Set," and, as part of the Court's final judgment or decree, an order that all copies of Shalom's Fox "Chunky Knit Hat & Pant Set" be destroyed pursuant to 17 U.S.C. § 503.

12. Blueberry Hill is further entitled to recover the damages, pursuant to 17 U.S.C. § 504, and Blueberry Hill's costs and attorney's fees, pursuant to 17 U.S.C. § 505.

SIXTH CLAIM FOR RELIEF
Utah State Law Unfair Competition

13. By this reference Blueberry Hill realleges and incorporates the foregoing paragraphs as though fully set forth herein.

14. Shalom's conduct is in violation of Utah Code Ann. § 13-5a-101 *et seq.*

15. Shalom has violated Utah Code Ann. § 13-5a-102(4)(a)(ii)(B) by infringing the BH Trade Dress.

16. Blueberry Hill has been injured by Shalom's infringement of the BH Trade Dress.

17. Pursuant to Utah Code Ann. § 13-5a-103, Blueberry Hill is entitled to recover damages, costs, attorneys' fees, and punitive damages from Shalom for infringement of the BH Trade Dress.

SEVENTH CLAIM FOR RELIEF
Utah State Law Deceptive Trade Practices

18. By this reference Blueberry Hill realleges and incorporates the foregoing paragraphs as though fully set forth herein.

19. Shalom, by its actions as set forth hereinabove, has caused a likelihood of confusion or of misunderstanding as to the source of its products and services and has thereby engaged in a deceptive trade practice, pursuant to Utah Code Ann. § 13-11a-3(1)(b).

20. Shalom's conduct as set forth hereinabove gives rise to a cause of action for deceptive trade practices and related wrongs under the statutory and common law of the State of Utah, including at least Utah Code Ann. § 13-11a-4(2)(a).

21. On information and belief, Shalom has engaged in deceptive trade practices against Blueberry Hill in willful and deliberate disregard of Blueberry Hill's rights and those of the consuming public.

22. By reason of Shalom's acts of deception, Blueberry Hill has suffered damage and irreparable harm.

23. Accordingly, Blueberry Hill is entitled to injunctive and monetary relief against Shalom, pursuant to at least Utah Code Ann. § 13-11a-4(2)(a) and (b).

Prayer for Relief

WHEREFORE, Blueberry Hill prays for entry of a final order and judgment that:

A. Shalom be adjudged to have infringed Blueberry Hill's copyrights in and to the BH Image;

B. Shalom be adjudged to have infringed Blueberry Hill's rights in the BH Trade Dress.

C. Blueberry Hill be granted preliminary and permanent injunctive relief pursuant to 17 U.S.C. § 502 enjoining Shalom, its officers, agents, servants, employees, and all those persons in active concert or participation with it from further acts of infringement of Blueberry Hill's copyrights in the BH Image;

D. Blueberry Hill be granted preliminary and permanent injunctive relief pursuant to Section 34(a) of the Lanham Act, 15 U.S.C. § 1116(a), and Utah Code Ann. § 13-11a-4(2)(a), enjoining Shalom, its officers, agents, servants, employees, and all those persons in active concert or participation with any of them from further acts of infringement of Blueberry Hill's rights in the BH Trade Dress;

E. Blueberry Hill be granted permanent injunctive relief enjoining Shalom, its officers, agents, servants, employees, and all those persons in active concert or participation with any of them, from engaging in deceptive trade practices, pursuant to at least Section 34(a) of the Lanham Act, 15 U.S.C. § 1116(a), and Utah Code Ann. § 13-11a-4(2)(a);

F. The Court issue an order impounding all copies of Shalom's Infringing Images pursuant to 17 U.S.C. § 503;

G. The Court order destruction of all copies of Shalom's Infringing Images pursuant to 17 U.S.C. § 503;

H. Blueberry Hill be awarded damages pursuant to 17 U.S.C. § 504;

I. Blueberry Hill be awarded damages, costs, attorneys' fees, and punitive damages from Shalom for infringement of Blueberry Hill's trade dress, pursuant to Utah Code Ann. § 13-5a-103.

J. Blueberry Hill be awarded damages and Shalom's profits, in an amount to be proven at trial, pursuant to applicable state statutory and common law, including at least the greater of Blueberry Hill's actual damages and \$2,000, pursuant to Utah Code Ann. § 13-11a-4(2)(b);

K. Blueberry Hill be awarded damages and costs and Shalom's profits under 15 U.S.C. § 1117 for Shalom's infringement of the BH Trade Dress.

L. As part of final judgment, the Court declare that this is an exceptional case under 15 U.S.C. § 1117, and award Blueberry Hill its attorneys' fees;

M. Blueberry Hill be awarded costs and attorneys' fees under 17 U.S.C. § 505; and

N. Blueberry Hill be granted such other and further relief as the Court may deem just and proper under the circumstances.

Demand for Jury Trial

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Blueberry Hill demands trial by jury on all claims and issues so triable.

Dated: May 10, 2017

MASCHOFF BRENNAN

By: /s/ Jared J. Braithwaite

Jared J. Braithwaite
Adam B. Beckstrom

Attorneys for Plaintiff
THE BLUEBERRY HILL LLC

EXHIBIT A



EXHIBIT B



EXHIBIT C



EXHIBIT D



EXHIBIT E

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number

VAu 1-244-211

Effective Date of Registration:

February 18, 2016

Title

Title of Work: The Blueberry Hill Knit Deer Set

Completion/Publication

Year of Completion: 2015

Author

• Author: Patty Othon Photography
Author Created: photograph
Work made for hire: Yes
Citizen of: United States

Copyright Claimant

Copyright Claimant: The Blueberry Hill LLC
1963 S 1200 E, #702, Salt Lake City, UT, 84105, United States
Transfer statement: By written agreement

Rights and Permissions

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Certification

Name: Jennifer Davis
Date: February 18, 2016